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10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE DISTRICT OF CALIFORNIA**

12 GORDON REES SCULLY  
MANSUKHANI LLP,

13 Plaintiff,

14 vs.

15 MSSK VENTURES, LLC; and  
16 KELLY GWIN,

17 Defendants.

CASE NO. \_\_\_\_\_

**GORDON REES SCULLY  
MANSUKHANI LLP'S PETITION  
TO CONFIRM ARBITRATION  
AWARD AND ENTER JUDGMENT**

*Accompanied by:  
Declaration of Richard P. Sybert and  
Exhibit 1*

18 Plaintiff Gordon Rees Scully Mansukhani LLP ("GRSM") by and through  
19 its attorney of record, Richard P. Sybert, submits this Petition to Confirm  
20 Arbitration Award and Enter Judgment. This petition is made based upon the Final  
21 Award issued by Hon. Linda L. Miller, Ret. ("Arbitrator") of the JAMS ADR,  
22 Case #5200001670 (the "Arbitration Award") in the matter of GRSM v. MSSK  
Ventures, LLC; Kelly Gwin dated May 28, 2024.

23 The Arbitration Award is attached as **Exhibit 1** to the Declaration of  
24 Richard P. Sybert filed with this petition. Plaintiff respectfully requests the Court  
25 grant this Motion based on the following:

26 1. Defendants MSSK Ventures, LLC and Kelly Gwin ("Defendants")  
27 hired GRSM for work pursuant to the April 1, 2023 Legal Services Agreement  
28 executed between the parties.

2. GRSM successfully defended a summary judgment motion after setting aside a default in the underlying Orange County Superior Court Cases Nos. 30-2021-01214263-CU-OR-NJC and 30-2022-01287031-CU-JR-CJC.

3. On or about May 28, 2024, GRSM filed the demand for arbitration with JAMS.

4. During the Arbitration, Defendants did not participate in the proceedings and the Arbitrator was satisfied that there had been ample notice and opportunity for the Defendants to be heard pursuant to JAMS Rules.

5. The Arbitrator determined based on a preponderance of the evidence, that GRSM proved its claim against Defendants for non-payment of legal fees and costs incurred pursuant to the April 1, 2023 Legal Services Agreement. On April 3, 2025, the Arbitrator issued the final award in favor of GRSM in the amount of \$106,777.08.

The Arbitration Award should be confirmed and judgment entered against Defendants pursuant to Federal Arbitration Act 9 U.S.C. Sec 1., *et. seq.* Federal Arbitration Act 9 U.S.C. Sec 1., *et seq.* provides that after an arbitration award has been made, any party to the arbitration may apply to the Court for an order confirming the award.

Pursuant to the Arbitration Award, GRSM is entitled to \$106, 777.08. In accordance with the Federal Arbitration Act 9 U.S.C. Sec. 1, *et seq.*, GRSM requests and Order from this Court confirming the Award and to enter Judgment accordingly.

Dated: June 16, 2025

GORDON REES SCULLY  
MANSUKHANI

By: /s/ Richard P. Sybert

Richard P. Sybert  
Attorneys for Plaintiff  
GORDON REES SCULLY  
MANSUKHANI LLP